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June 11, 2015

VIA ECF & FACSIMILE

Honorable Naomi Reice Buchwald  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 21A  
New York, New York 10007-1312

Re: *In re Intercept Pharmaceuticals, Inc. Sec. Litig.*,  
No. 1:14-cv-01123-NRB

Dear Judge Buchwald:

We write on behalf of the Plaintiff in the above-captioned action. Following extensive meet and confer discussions, the parties agree that there are two issues regarding the relevance of documents responsive to certain of Plaintiff's document requests that are ripe to be brought to the Court. In accordance with Local Civil Rule 37.1 and Your Honor's Individual Practices 2(B), Plaintiff is prepared to submit a letter-motion for a pre-motion discovery conference. In lieu of a separate letter for each discovery issue, Plaintiff believes it would be most efficient to file a single letter not to exceed five pages addressing both issues. If this is acceptable to the Court, Plaintiff is prepared to submit the letter-motion by Monday, June 15, 2015. Defendants do not object to the request and, if granted, request permission to file a five page letter-response.

Respectfully submitted,

s/ TOR GRONBORG

TOR GRONBORG

TG:mm

cc: James Prendergast, Esq. (via ECF and email)  
Shauna Friedman, Esq. (via ECF and email)  
Michael Bongiorno, Esq. (via ECF and email)  
Trig Smith, Esq.